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May 18, 1993

**JUN - 2 1993**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARYOffice of the Secretary  
Federal Communications Commission  
Washington, D.C. 20554RE: **DOCKET 92-235**

Dear FCC Commission and Staff:

FCC docket 92-235 has serious and costly effects on public safety in Oregon, as well as the rest of the nation. The reasoning behind this docket is centered around an attempt to create additional radio channels which are needed in large metropolitan areas where all radio spectrum is utilized. The docket fails to recognize that many areas in this vast country do not have a problem with lack of radio channels, nor does it recognize the tremendous costs and impact on emergency service the rules will impose.

Attached to this memo is a detailed description of the impacts of this legislation on Lane County area public safety agencies.

In 1996 the FCC proposes to reduce allowable power. This will reduce talk out range by a substantial amount requiring additional base stations and simulcast to maintain current coverage. After the docket is adopted, however, all new stations capable of operating within 4 KHZ of occupied bandwidths will not be compatible with existing radio equipment and manufacturers indicate that at the present time no equipment is available which will meet the proposed standards. This places public safety agencies in the position of accepting reduced coverage; replacing all mobiles, portables, and base stations prior to January 1, 1996; or asking for a waiver of the rules.

Providing important public safety service to the public is becoming increasingly difficult with declining revenues and increasing operating costs. Implementation of this docket simply compounds the problem by requiring us to divert a large portion of our resources from direct service to acquisition of land, purchase of additional repeaters and replacement of all radio equipment to comply with these rules.

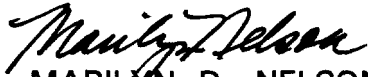
**We are requesting that the FCC delay implementation of this docket until 2004, and revision of the docket according to the attached recommendations.**

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Extending the implementation until 2004 will allow a reasonable period of time for securing funds to make the conversion. We are confident that you recognize the importance of delaying implementation of these rules for maintaining the viability of public safety agencies such as ours.



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CENTRAL LANE PSAP



DAVID WHITLOW -- DIRECTOR  
EUGENE PUBLIC SAFETY



BOB MCMANUS -- SHERIFF  
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DICK GOLDEN -- ACTING CHIEF  
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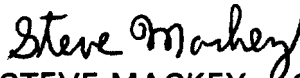
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SKIP SMITH -- CHIEF  
SANTA CLARA RURAL FIRE

GH/MDN:anp

cc: Oregon Congressional Delegation  
Lane County Area Legislators

Attachment: Comments on FCC Docket 92-235

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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JUN 1 1993  
FCC MAIL ROOM

BEFORE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20544

In the Matter of:

Replacement of Part 90 by  
Part 88 to revise the private  
land mobile radio services and  
modify the policies governing  
them.  
DOCKET NUMBER 92-235

TO: The Commission

COMMENTS OF THE MEMBER AGENCIES OF  
CENTRAL LANE COUNTY, OREGON, 9-1-1 PSAP USER GROUP

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

## INTRODUCTION

Central Lane 9-1-1 Communications is a regional emergency communications service provided to police, fire and emergency medical response agencies in the central part of Lane County, Oregon, by the Eugene, Oregon Department of Public Safety. This 9-1-1 Public Safety Answering Point (PSAP) serves an area of approximately 2300 square miles of combination urban/rural density over rugged terrain. Approximately 250,000 people are served by Central Lane 9-1-1, or 86 percent of the county's population.

9-1-1 call-taking services are provided for 6 law enforcement agencies, 2 emergency medical response agencies, 4 water districts, and 24 fire agencies. Approximately 600,000 calls are handled, routed or processed each year. These comments are filed on behalf of all the police, fire and EMS agencies receiving these 9-1-1 call-taking services from Central Lane 9-1-1, by the agencies' representatives on the regional Central Lane 9-1-1 PSAP User Group.

Emergency dispatching services are provided to these agencies by five public safety dispatch centers. Four of these dispatch centers are operated by local or State law enforcement agencies, one of which provides dispatching not only for its own police department, but for another police department and a fire department. The fifth dispatch center is operated by Eugene Department of Public Safety supporting one police agency, 2 emergency medical response agencies, 4 water districts, and 25 fire agencies. Approximately 140,000 calls are dispatched by Eugene. Police operate with 4 UHF radio channels for dispatch and tactical purposes. Fire/EMS are designated 8 VHF channels.

Radio services are provided with six fixed radio sites, two supporting Eugene dispatch, and four supporting the other police dispatch centers.

Directional antennas are used to maintain coverage within specific service areas. Due to voice congestion over the support police channel, and to increase field productivity, Central Lane Communications has piloted a portable computer project. Compressed data transmitted from the mainframe computer network through radio to the field maximizes efficiency of a radio channel. Since location is displayed, it need not be repeated; unit status can be indicated by a keystroke rather than voice; officers can make their own database inquiries. Laptop computers in public safety response vehicles will act as mobile data terminals, be connected to the regional mainframe like desk-top terminals, and be stand-alone personal computers for word processing and other uses.

It is from this position that the member agencies of Central Lane 9-1-1 PSAP User Group provide the following comments, and suggestions, regarding docket 92-235.

## GENERAL COMMENTS

On page one, section two, of the introduction to Docket 92-235 it is stated in essence that without the proposed changes, private land mobile radio will deteriorate to the point of endangering public safety and the national economy. In our opinion the sweeping changes proposed will cost the private and public sector hundreds of billions of dollars to keep the level of radio communications at the current level. This, at a time when the economy is strained, and State and local government budgets are strapped for funds. The effect, over a rather short term, will be to divert money that should be spent to support police, fire and emergency medical services to new radio equipment mandated by federal regulations. Without destroying the current effective networks, we feel changes can be made that will increase the number of channels in the VHF high band and UHF bands. These changes, coupled with increased use of portable computer/MDTs, increased use of 800 MHZ in metropolitan areas, new allocations at 220 MHZ, PCN/PCS technology and mobile satellite technology should meet the communications needs of largely rural states, such as Oregon, well into the next century. The commission should look hard at the cost benefit in each State before implementing these changes. We suggest that regional planning committees be utilized to determine what is needed in each State, and how neighboring States would be affected. Major changes, such as those proposed, should only be made when cost and service impacts are in the best interest of the public.

Major environmental impact would also result from the proposed changes. Reducing transmitter power, by the Commission's own assessment, will necessitate additional transmitter sites. In Oregon, this means developing new sites on private land, at high cost to our taxpayers, or on park or national forest land. These sites, with access roads, power lines and towers will be costly to construct and maintain, and will have a significant impact on the land.

The changes proposed in 1996 will seriously degrade the Central Lane radio network at a time when local member agencies' budgets are being cut and the 9-1-1 telephone excise tax revenue is insufficient to support a State-mandated program. The net effect will be to reduce radio coverage, threatening officer safety and increasing local liability for failure to dispatch. State-wide 9-1-1 services will not be feasible because, while the public may still call in their complaint, local dispatch centers will not have the radio network capability to ensure dispatch and field support.

In summary, the changes proposed by the Commission will have major economic, environmental, officer safety and public service impact in Central Lane County, Oregon. We, therefore, offer the following comments to specific items we feel can be implemented without the destructive impact of the proposed part 88 changes.

## SPECIFIC COMMENTS

### REDUCED POWER AND DEVIATION IN 1996

This will negatively impact the safety of firefighters, medics and officers, and most importantly the public served by Central Lane 9-1-1, by:

1. Reducing the coverage of our radio systems;
2. Reducing the amount of recovered audio in mobile and portable radios, making it difficult for officers to hear dispatch in noisy environments;
3. Interfering with the proper operation of voice encryption systems, which must be used in certain law enforcement situations; and
4. Reducing the reliability of tone and squelch decoders, used throughout our system, and increasing the potential for lost communications during life threatening situations.

Recommendation: The FCC should delay implementation of the first phase of the plan to at least the year 2004, instead of 1996, to allow local governments the ability to plan for their equipment migration. At that time, a channel plan should be introduced that uses 12.5 Khz channel spacing in both VHF and UHF bands. We feel the 12.5 Khz spacing will allow for minimum cost and allow manufacturers the ability to provide equipment that provides the quality of communications necessary to public safety. Further reduction in channel spacing below 12.5 Khz should not be mandated in rural areas without a documented need for additional public safety channels in the VHF or UHF bands, as established on a state-by-state basis. Any spacing plan must be fully compatible with APCO Project 25 standards and provide interoperability with federal government agencies.

#### EFFECTIVE RADIATED POWER BASED UPON HEIGHT ABOVE AVERAGE TERRAIN

We submit that this is a low-technology approach to a high-technology problem. The HAAT chartg assumes that the Earth is flat, ignores the effects of terrain, limits the use of downtilt and directional antennas, and ignores all engineered solutions to specify coverage.

Recommendation: New applicants and, at some point, existing license holders should be required to submit documentation showing that the proposed radio system is designed to cover the geopolitical area of the licensee and limit the signal strength outside of that area. The engineering documentation should show a design that maximizes the use of downtilt and/or directional antenna arrays, proper transmitter site location, and the minimum transmitter power required to meet the coverage criteria. Mobile radio ERP should also be restricted to a power level needed to meet the coverage criteria.

#### CHANNEL ASSIGNMENT PROPOSAL

The interspersing of SMR operations with public safety allocations will lead to increased interference, due to the fact that many public safety transmitter sites are co-located with commercial sites.

Recommendation: Public safety should be allowed to retain block allocation of spectrum in the VHF and UHF bands. Public safety allocations must be protected from the private sector by allowing only those qualified public safety providers to hold licenses in the public safety radio service. Block allocations will allow public safety to take advantage of future technology breakthroughs, such as high speed data for photo imaging, fingerprint transmission, compressed video and TDMA. Only through block allocations can the necessary

bandwidth be provided for these applications. In addition, public safety should retain a large portion of the total VHF and UHF available spectrum, as the Commission has indicated it would be for a need that is second only to National Defense.

#### MOBILE RELAY OPERATION

This section in the proposed changes is somewhat misleading in that it appears, in some sections, that mobile relays are permitted and yet, in other sections, it appears that they are not.

Recommendation: Public safety must be allowed mobile relay operation in all bands. In addition, any frequency plan must allow for proper transmitter-to-receiver spacing, so as not to impede this mode of operation.

#### SECONDARY SIGNALING (PAGING)

The proposed regulations appear to restrict the ability of public safety to use secondary signaling on VHF and UHF channels. The many fire districts and departments operating through Central Lane rely heavily secondary signaling as a means to alert volunteer firefighters to a call. Special law enforcement teams, SWAT and K-9 for example, also rely on this type of equipment for notification.

Recommendation: Public safety must be allowed to continue use of secondary signaling devices and paging in all bands in order to notify responders in a timely, accurate fashion.